



# **Michigan Environmental Compliance Conference**

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517-373-0590**

# **Environmental Assistance Center (EAC)**

**Phone: 1-800-NO2-WASTE  
(1-800-662-9278)**

**Hours: 8:00 am to 4:30 pm  
Monday – Friday**

## **Compliance Assistance Services Include:**

**Air  
Waste  
Water  
Storage Tanks**

**Environmental Audit Privilege  
Brownfield Redevelopment  
Site Remediation  
Permit Coordination**

# **Waste Session 3**

## **Generator Recordkeeping and Inspection Day**

# **Why Cover These Topics**

## **Hazardous waste regulations...**

**apply to all businesses, including  
municipalities, hospitals, and service  
industries, not just manufacturing industries**

**are written broadly to address hazards  
posed by all waste streams**

# Why Cover These Topics

## Hazardous waste regulations require each business to...

Properly prepare, maintain, and have available at the time of inspection all documents required under RCRA and Part 111 rules

Keep all documents on-site for a period of not less than 3 years from the last date of off-site shipment or on-site treatment or disposal

# **Paperwork Requirements**

## **Paperwork Requirements Include:**

**Notification of Waste Activity (Site ID)**

**Waste Characterizations**

**Manifests and Shipping Records**

**Land Disposal Restriction Forms (LDRs)**

**Waste Area Inspection Documents**

**Biennial Reports**

**Training Records**

**Contingency (Emergency) Plans**

# **Notification of Waste Activity**

## **Site ID Form**

### **Who must notify:**

**Hazardous Waste Generators (CESQG liquids, SQG, LQG,)  
Liquid Industrial Waste Generators  
Hazardous/Liquid Industrial Waste Transporters  
Hazardous/Liquid Industrial Waste Receiving Facilities**

**Resource Management  
Division (RMD) issues  
Site ID number to facilities  
*per site* upon receipt of  
notification form**

**Notification of Regulated  
Waste Activity  
EQP5150**

EQP5150 is the Michigan replacement form for U.S. Environmental Protection Agency Form 8700-12  
revised 3/98





# **Notification of Waste Activity**

## **Site ID Form**

- Request pre-populated Site ID Form for subsequent or updated notifications from RMD, Manifest Tracking and Data Management Unit by calling 517-335-2690
- To expedite form processing, fax notification and pay (if required) on-line with credit card
- Liquid industrial waste generators who are not required to manifest wastes are not required to notify

# Manifests & Shipping Records

- Uniform Manifest must be used when hiring permitted and registered transporter to ship hazardous waste or liquid industrial waste
- Uniform Manifest is not required when using tolling agreement, self transporting own liquid Industrial waste with trip log, or using a consolidated manifest

# Manifests & Shipping Records

## Uniform Manifest exceptions:

- SQGs shipping hazardous waste off-site for reclamation and regenerated material is brought back to generator under a tolling agreement
- Generators hauling  $\leq 55$  gallons of their own liquid industrial waste to designated facility with trip log
- Transporters using a consolidated manifest for hazardous or liquid industrial waste - transporter provides shipper with a record that includes manifest number

[illegible]

# Manifests

Please print or type. (Form designed for use on site (12-pitch) typewriter.) Form Approved, OMB No. 2050-0039

**UNIFORM HAZARDOUS WASTE MANIFEST**

1. Generator ID Number: \_\_\_\_\_ 2. Page 1 of 3 3. Emergency Response Phone: \_\_\_\_\_ 4. Manifest Tracking Number: **000137379 GBF**

5. Generator's Name and Mailing Address: \_\_\_\_\_  
 Generator's Site Address (if different than mailing address): \_\_\_\_\_  
 Generator's Phone: \_\_\_\_\_

6. Transporter 1 Company Name: \_\_\_\_\_ U.S. EPA ID Number: \_\_\_\_\_  
 7. Transporter 2 Company Name: \_\_\_\_\_ U.S. EPA ID Number: \_\_\_\_\_  
 8. Designated Facility Name and Site Address: \_\_\_\_\_ U.S. EPA ID Number: \_\_\_\_\_  
 Facility's Phone: \_\_\_\_\_

9a. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))

10. CERCLA Section 106(a)(2)(B) Identification Number

11. Total Quantity

12. Unit Weight

13. Waste Codes

14. Special Handling Instructions and Additional Information

15. GENERATOR'S/OFFEROR'S CERTIFICATION. I hereby declare that the contents of this manifest are true and accurate, and are classified, packaged, marked and labeled, placarded, and are in all respects in proper condition for shipment according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this manifest conform to the requirements of the attached EPA Acknowledgment of Receipt. I certify that the waste identification statement identified in 9a, 9b, and 9c is true. (If I am a large quantity generator or a small quantity generator, I am a small quantity generator.)

Generator's/Offeror's Printed/Typed Name: \_\_\_\_\_ Signature: \_\_\_\_\_ Month: \_\_\_\_\_ Day: \_\_\_\_\_ Year: \_\_\_\_\_

16. International Shipments ☐ Export to U.S. ☐ Export from U.S. Part of export/shipment Date leaving U.S.: \_\_\_\_\_

17. Transporter Acknowledgment of Receipt of Materials

Transporter 1 Printed/Typed Name: \_\_\_\_\_ Signature: \_\_\_\_\_ Month: \_\_\_\_\_ Day: \_\_\_\_\_ Year: \_\_\_\_\_  
 Transporter 2 Printed/Typed Name: \_\_\_\_\_ Signature: \_\_\_\_\_ Month: \_\_\_\_\_ Day: \_\_\_\_\_ Year: \_\_\_\_\_

18. Discrepancy

19a. Discrepancy Indication (Specify) ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection

19b. Alternative Facility (or Generator) Manifest Reference Number: \_\_\_\_\_ U.S. EPA ID Number: \_\_\_\_\_  
 Facility's Phone: \_\_\_\_\_  
 Signature of Alternative Facility (or Generator): \_\_\_\_\_ Month: \_\_\_\_\_ Day: \_\_\_\_\_ Year: \_\_\_\_\_

19c. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, storage, and disposal systems)

20. Designated Facility Owner or Operator. Certificate of receipt of hazardous materials on the manifest except as noted in item 19c.

Designated Facility Owner or Operator Printed/Typed Name: \_\_\_\_\_ Signature: \_\_\_\_\_ Month: \_\_\_\_\_ Day: \_\_\_\_\_ Year: \_\_\_\_\_

EPA Form 8700-22 (Rev. 3-00) Previous editions are obsolete.

DESIGNATED FACILITY TO DESTINATION STATE (IF REQUIRED)

- Generators are responsible for all information in manifests
- Copy left at time of shipment is called the “two signature or generator copy.”
- Copy sent to generator by disposal facility is called the “third signature or TSD copy” because it verifies that waste was delivered to disposal facility

# **Land Disposal Restrictions (LDR)**

## **Overview**

- Applies to hazardous wastes from SQGs and LQGs
- Requires generator to characterize, provide an LDR notice to each TSD for each waste stating waste does or does not meet LDR standards
- Requires treatment before land disposal for most wastes

# **Land Disposal Restrictions (LDR)**

## **Overview**

- To determine if treatment is required, review if waste codes for each waste stream meet the standards in 40 CFR 268.40, 268.45 (debris), or 268.49 (soil)
- New LDR notification must be sent when there is a waste or facility change
- Land disposal includes any disposal on land (landfill, land treatment, injection well, salt caverns, etc)

# **LDR Generator**

## **Recordkeeping Requirements**

- Notification is required even for shipment to non-land based TSDs (e.g. incinerator)
- Generators treating a prohibited waste to meet the standards in 40 CFR 268.48 must have a written waste analysis plan describing the activities they perform to meet the treatment standards



# **LDR Generator**

## **Recordkeeping Requirements**

- SQGs and LQGs must keep LDRs related documents for at least 3 years after waste is last sent to TSD or treated on-site
- LDRs must have complete information such as categories of waste and underlying hazardous constituents
- Information on LDR must be consistent with the waste characterization

# Hazardous Waste Biennial Report

- Required of LQGs and TSDs
- Submit to RMD by March 1 of even-numbered years
- Report includes both MI and EPA hazardous wastes
- Details hazardous waste activity in previous odd year
- Keep copy at least 3 years from due date

SAFETY KLEEN SYSTEMS, INC.  
700 ZIMMERMAN BLVD  
MADON, MI 48054-1018

COLLECTION OF DATA FOR THE  
HAZARDOUS WASTE (biennial) REPORT for  
HAZARDOUS WASTE GENERATED OR MANAGED

1/12/2011 - 12/31/2011

EXAMPLES  
(Continued)

U.S. ENVIRONMENTAL  
PROTECTION AGENCY  
1999 Hazardous Waste Report

IDENTIFICATION AND  
PARTICIPATION

Part 1: General Information

Part 2: Identification of Sites

Part 3: Identification of Parties

John Drough

# Hazardous Waste Storage Area Inspection Records

SQGs and LQGs must perform weekly container accumulation area inspections and each operating day for a hazardous waste storage tanks

LQGs must document hazardous waste container accumulation area and tank inspections

REQUIRED WEEKLY HAZARDOUS WASTE MAINTENANCE CHECKLIST																				
MONTH:																				
YEAR:																				
WEEK #	1	2	3	4	1	2	3	4	1	2	3	4	1	2	3	4	1	2	3	4
Labeled																				
Dated																				
Containers Closed																				
Spills																				
Containment																				
Corrective Measures																				
Date																				
Initials																				

**Labeled:** Check that all drums and all other containers are properly labeled ("Hazardous Waste" and waste number).

**Dated:** Check to see if the container is dated with the date accumulation began and the date on the container has not exceeded 90 or 180 days, which ever is applicable. If container date has exceeded 90 or 180 days, contact management.

**Containers Closed:** Make sure that containers are closed (i.e. both bungs are in drums, drum ring top is secure, funnel tops closed, funnel valve closed, or tarp over roll-off box).

**Spills:** Check that all containers are not leaking, bulged, or in poor condition. Are spills present?

**Containment:** Make sure that there hasn't been any degradation to the secondary containment, (i.e., any cracks, is coating sufficient?) (Is there enough set back distance of containers for squirt protection? Are all containers in the containment area?)

**Corrective Measures:** Are corrective measures needed?

**Date & Initials:** Inspector dates and initials.

On the back write comments on any areas above that were not in compliance (include the date). Also, record any measures being taken to correct the problems (include the date).

(rev. on 5/14/97 by:clz:\doc\required weekly hazardous waste maintenance checklist: EAB)

# **Emergency Planning and Training**

**CESQGs**

**have no specific requirements!**

# Emergency Planning and Training

## SQG Requirements

- Informal training
- Training records not required
- No stipulated review period, annual suggested
- Must post **CURRENT** emergency info by phone near hazardous waste operations
- Must send facility diagram or discuss facility hazards, layout, access, etc. with responders
- Must ensure emergency coordinator is identified and on premises or on-call

# Emergency Planning and Training

## SQG Emergency Posting

### HAZARDOUS WASTE EMERGENCY INFORMATION

EMERGENCY NAME \_\_\_\_\_  
COORDINATOR PHONE \_\_\_\_\_  
ALTERNATE NAME \_\_\_\_\_  
PHONE \_\_\_\_\_  
FIRE DEPT. PHONE \_\_\_\_\_  
HOSPITAL PHONE \_\_\_\_\_  
POLICE PHONE \_\_\_\_\_

Fire alarm is located: \_\_\_\_\_  
\_\_\_\_\_

Spill control equipment is located: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Fire extinguishers are located: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Map of facility with emergency equipment, spill equipment, exit routes, and alarm locations.



National Response Center: 1-800-424-8802  
Michigan Pollution Emergency: 1-800-292-4706

Provided by: The Environmental Assistance Division and the Waste Management Division of the Michigan Department of Environmental Quality  
Environmental Assistance Center 1-800-662-9278

Other hazardous waste requirements may apply.



# **Emergency Planning and Training**

## **LQG Requirements**

- **Must have written hazardous waste training program**
- **Must conduct annual training for employees**
- **Must keep written training records for 3 years**
- **Training must be conducted by someone qualified to give training**

# Emergency Planning and Training

## LQG Requirements

- Must have description of the *type of training given*
- Must have **CURRENT** and complete written contingency plan on-site
- Must make arrangements with fire department, police, hospitals, emergency response contractors, and local emergency response teams and have documentation on that contact



# **Emergency Planning and Training**

## **LQG Requirements**

### **LQG training must include:**

- Usage, inspection, repair and replacement of facility emergency and monitoring equipment
- Key parameters for automatic waste feed cut-off systems
- Communications and alarm systems
- Response actions for fires and explosions
- Response actions for contamination incidents
- Shutdown of operations

# Pre-Transport Placard Requirements

If offering 1,000 lbs. for shipment at one time, SQGs and LQGS must have US DOT placards for waste hazards available for transporters use



# **Tank Inspection Documents**

**All tank inspections must  
be documented and all records  
must be kept for at least 3 years**

# **Tank Certification**

**Must obtain a written assessment that is reviewed and certified by an qualified professional engineer that includes:**

- **Design standards**
- **Hazard characteristics of the waste**
- **Determination performed by corrosion expert if the external shell of a metal tank is in contact with soil or water**
- **Design considerations if tank affected by vehicles**

# **Tank Certification**

**Professional engineer written certification  
must be kept on file at facility**

# Inspection Day!

## The Process



**Arrival/Greeting**



**Opening Meeting**



**Walk Through**



**Closing Meeting**

# **Inspection Day!**

## **When & Why Does an Inspector Visit?**

- Routine compliance inspection utilizing a “Neutral Criteria Plan”
- Complaint received
- Manifest discrepancies
- Inspection requested by another agency

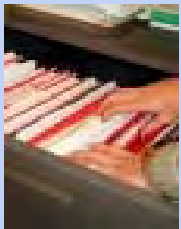
# How to Survive an Inspection



**Relax!**



**Don't be adversarial.**



**Have your records in order.**



**Don't try to hide anything.**



**If asked to “fix” something, consider doing it then if possible.**

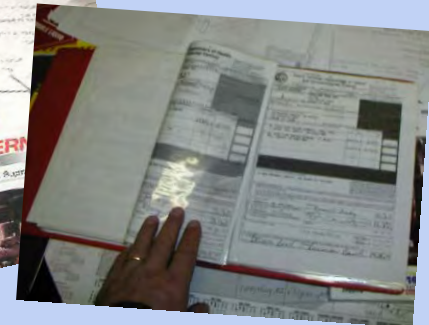
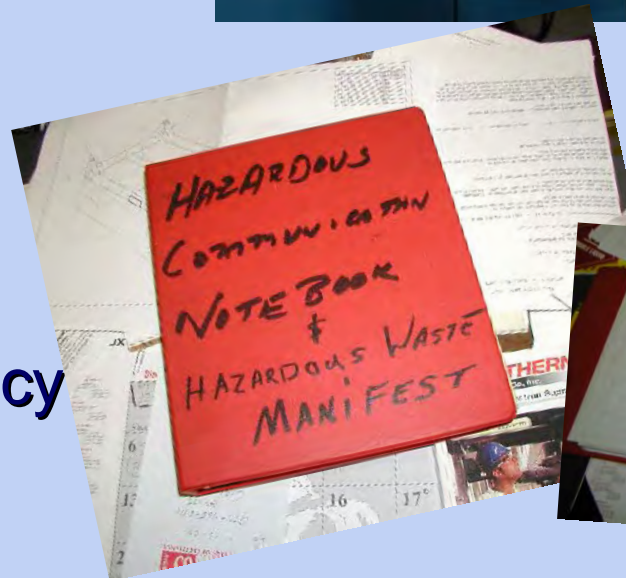


# What Do Inspectors Look At?

## Records:

**Waste Related –**  
waste characterizations,  
manifests, LDRs,  
storage area logs,  
biennial report

**Emergency  
Preparedness –**  
personnel training  
records, contingency  
plans, spill control  
equipment



# What Do Inspectors Look At?

## Waste Handling and Accumulation Areas:

Containers, tanks, labeling, secondary containment, including decommissioned waste handling areas



# GALLERY OF VIOLATIONS



# Manifest Common Violations

Please print or type. (Form designed for use on white (12-pitch) typewriter.)

**UNIFORM HAZARDOUS WASTE MANIFEST**

1. Generator ID Number: **000137379 GBF**

2. Generator's Name and Mailing Address:

3. Generator's Phone:

4. Transporter 1 Company Name: U.S. EPA ID Number:

5. Transporter 2 Company Name: U.S. EPA ID Number:

6. Designated Facility Name and Site Address: U.S. EPA ID Number:

7. Facility's Phone:

8. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))

9. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))

10. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))

11. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))

12. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))

13. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))

14. Special Handling Instructions and Additional Information:

15. GENERATOR'S OFFICER'S CERTIFICATION: (I hereby declare that the contents of this manifest are fully and accurately described above by the proper shipping name, hazard class, ID number, packing group and appropriate hazard labels in all respects in proper condition for transport according to applicable international and national government regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this manifest conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste is exclusively material identified in 40 CFR 261.27(a) (1) I am a large quantity generator or (2) I am a small quantity generator.)

16. International Shipments: ☐ Import to U.S. ☐ Export from U.S. ☐ Port of embarkment Date leaving U.S.

17. Transporter Acknowledgment of Receipt of Materials: (Signature) Month Day Year

18. Discrepancy: ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection

19. Alternate Facility (or Generator): (Signature) Month Day Year

20. Designated Facility Owner or Operator: (Signature) Month Day Year

21. Hazardous Waste Report Management Method Codes (see codes for hazardous waste treatment, disposal, and recycling systems)

22. Designated Facility Owner or Operator: (Signature) Month Day Year

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO DESTINATION STATE (IF REQUIRED)

- Using wrong ID number
- Using wrong or incomplete waste codes
- Failing to send copy to state
- Failing to keep signed manifests for three years
- Failing to have records of used oil shipped on consolidated manifest

# **LDR Common Violations**

- **Failing to keep LDRs and related documents for at least 3 years after waste last sent to TSD**
- **Missing LDR notification and waste analysis documents**
- **Missing or incomplete information such as categories, underlying hazardous constituents, and manifest numbers**
- **Listing LDR information that is inconsistent with waste characterization**



# Common Storage Violations

Don't stack more than 2 drums high

Failing to have adequate space or aisle width to properly inspect containers and for emergency personnel

Failing to have labels visible for inspections

Leaning drum is a safety issue!



# Common Storage Violations

- ☹ Exceeding the allowable on-site accumulation time limit for hazardous waste without requesting an extension or obtaining a storage permit



Notice leaking drums and stains

# Common Storage Violations



**Failing to keep the containers closed, except when waste is added or removed**



# Common Storage Violations



Failing to keep the containers closed, except when waste is added or removed



# Common Storage Violations

*Notice the splashing on the wall*

Leaving funnels in place that are not screwed into the bung and funnel not capable of being kept closed would be considered open



*Valve must be closed except when adding waste*

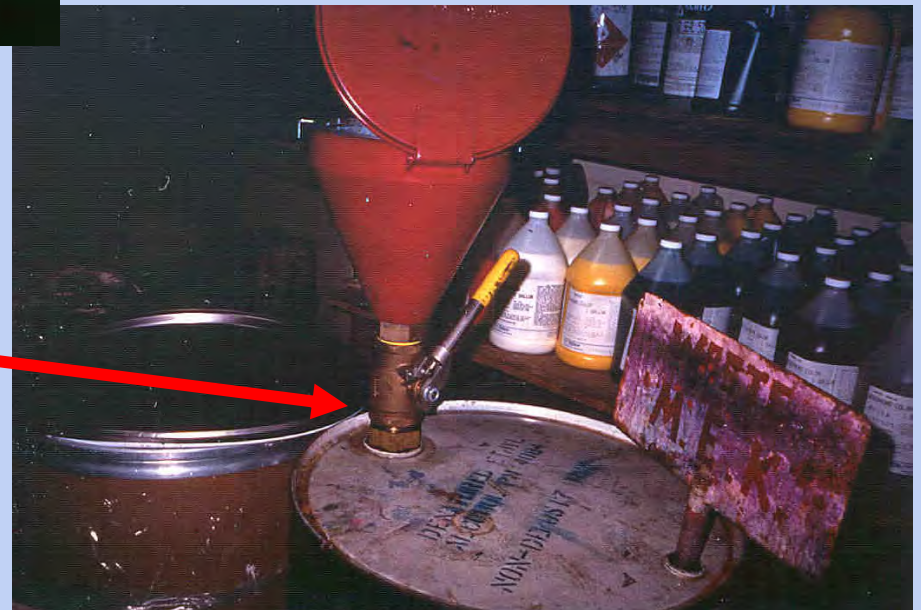


# Common Storage Violations



Lockable option

Notice the valve,  
it automatically  
closes when  
handle is released





# Waste Labeling and Storage

**Requirements vary based on  
waste type and amount**

**Less Regulation**



**Liquid Industrial Waste Generators (LIW)**

**Universal Waste Generators**

**Conditionally Exempt Small Quantity Generators (CESQGs)**

**Small Quantity Generators (SQGs)**

**Large Quantity Generators (LQGs)**

**More Regulation**



# Storage Container Labeling Violations

Listing incorrect or incomplete information on hazardous waste labels



- Missing the accumulation date
- Missing the words “Hazardous Waste”
- Missing the hazardous waste numbers

# Compliant Storage Labeling



# Accumulation label

# HAZARDOUS WASTE

## FEDERAL LAW PROHIBITS IMPROPER DISPOSAL

IF FOUND, CONTACT THE NEAREST POLICE OR PUBLIC SAFETY  
AUTHORITY OR THE U.S. ENVIRONMENTAL PROTECTION AGENCY

GENERATOR  
NAME \_\_\_\_\_

EPA # \_\_\_\_\_

ADDRESS \_\_\_\_\_

CITY \_\_\_\_\_

STATE \_\_\_\_\_

ZIP \_\_\_\_\_

EMPAIDOT (SHIPPING DESCRIPTION)

(PROPER SHIPPING NAME — UNNA NO. — CONSTITUENTS OR EPA WASTE CODE/CHARACTERISTICS)

DATE OF FINAL  
ACCUMULATION \_\_\_\_\_

SATELLITE  
ACCUMULATION \_\_\_\_\_

EMERGENCY  
RESPONSE GUIDE # \_\_\_\_\_

WHEN HANDLING OR DURING ROUTING OR EMERGENCY EXPOSURE TO THE  
HAZARDOUS WASTE IN THIS CONTAINER, USE THE SAFETY EQUIPMENT  
CHECKED BELOW

- ☐ Hard Hat
- ☐ Safety Glasses
- ☐ Safety Goggles
- ☐ Full Face Shield
- ☐ Protective Gloves
- ☐ Splash Apron
- ☐ Protective Boots

- ☐ Respiratory Protection
- ☐ Air-Purifying Respirator
- ☐ Type \_\_\_\_\_
- ☐ Fully Encapsulated Suit
- ☐ Atmospheric Supplying Respirator

Type \_\_\_\_\_

ACCEPTANCE  
AT TSD# \_\_\_\_\_

REPORTABLE QUANTITY  
"10" IN POUNDS

"10"

LBSL

MANIFEST  
NUMBER # \_\_\_\_\_

IN THE EVENT OF A SPILL OF THIS HAZARDOUS WASTE, CONTACT THE  
U.S. COAST GUARD NATIONAL RESPONSE CENTER AT 800-424-8802 FOR  
INFORMATION AND ASSISTANCE AND THE 24-HOUR EMERGENCY PHONE OF  
THE LOCAL OPERATOR IN THE COMMUNITY WHERE SPILL TOOK PLACE.

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# Shipping label

# Common Storage Violations

## Using Containers in Poor Condition

**Some bad containers are obvious!**



**Leaking tank**



# Common Storage Violations



Others require looking  
all around the container  
to see a problem

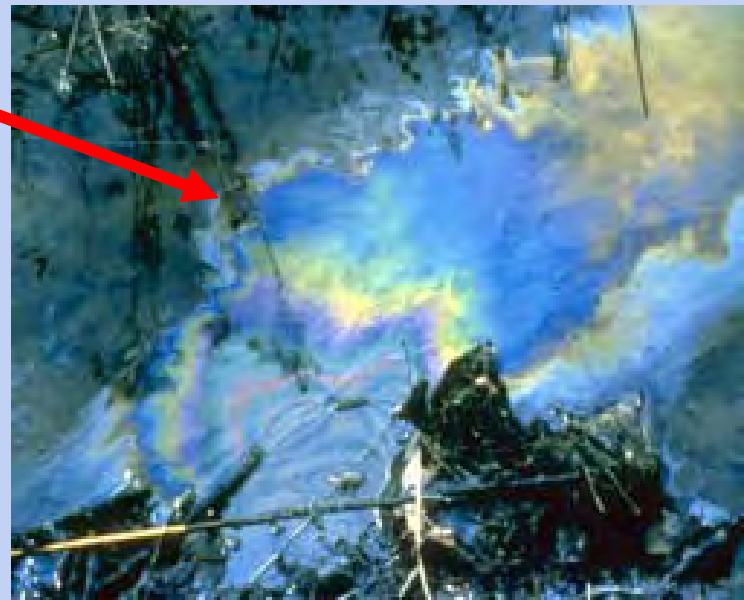
Look for staining as a sign





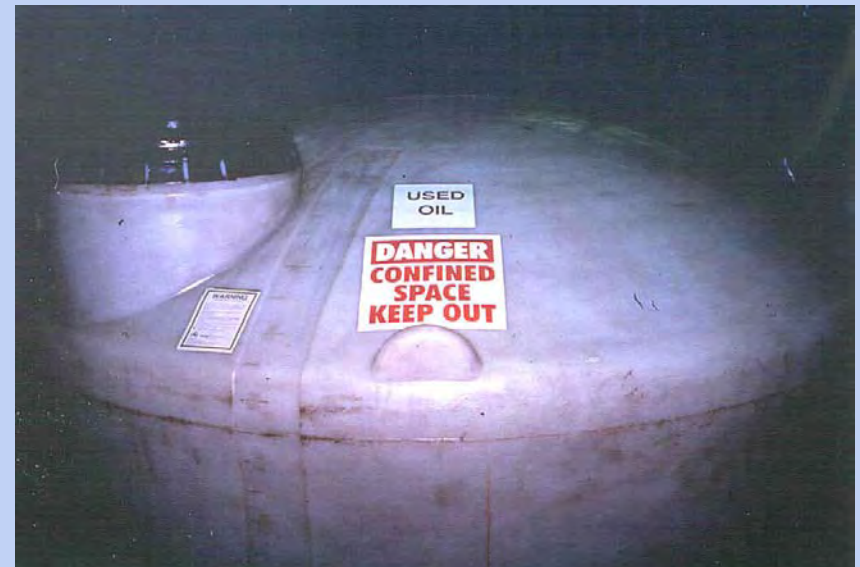
# Common Storage Violations

Other leaks require noticing signs on the ground or puddles, etc.



# Common Storage Violations

## Compliant used oil storage



# Common Disposal Violations

Illegal disposal of  
used oil





# Common Secondary Containment Violations



Lacking or inadequate secondary containment for LQGs and SQGs with 2200 lbs.

# Common Secondary Containment Violations

**Failing to have containers elevated or base of containment sloped to drain when required**

**Lacking or inadequate squirt protection**

**Notice the staining**



**Sill is not high enough**

# Common Secondary Containment Violations



**Lacking or inadequate chemical resistant coating and having cracked surfaces**





# **Common Secondary Containment Violations**



**Failing to remove precipitation in a timely manner from containment areas**

**How can drums be checked for leaks if buried in snow?**

# Common Secondary Containment Violations

**Sloping ramp saves backs and reduces spills when moving materials in and out of containment area**



**Spill pallets OK for solids but does NOT provide squirt protection for liquids**

**This type does provide squirt protection**





# Sorbents

Sorbents can be landfilled *IF* they don't contain free liquids, AND are not a hazardous waste, OR were generated by a CESQG



# Sorbents



**Sorbents  
used to clean  
up hazardous  
waste by  
SQG or LQG  
*must* be  
handled as  
hazardous  
waste –  
roadside or  
not!**

# **Inspection Follow-up What Is Necessary?**



**Respond according to the letter sent by the RMD**

**Accompany inspector if there is a follow-up second inspection**

**Have a question about the inspection? Call the inspector**

**Have general waste question?  
Contact the Environmental  
Assistance Center at 800-662-9278**

# NEED HELP?

- ✓ Go to [www.michigan.gov/deqwaste](http://www.michigan.gov/deqwaste)
- ✓ Contact the DEQ EAC at 1-800-662-9278
- ✓ Search the DEQ Publication Center
- ✓ Contact DEQ district waste inspection staff
- ✓ Contact hazardous waste vendors
- ✓ Contact waste consultants